

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

| | | |
|----------------------------------|---|--------------|
| ANAHEIM GARDENS, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | No. 93-655C |
| |) | (Judge Tapp) |
| THE UNITED STATES, |) | |
| |) | |
| Defendant. |) | |

JOINT STATUS REPORT

Pursuant to the Court's December 13, 2023 order (ECF No. 736 at 2), plaintiffs, Anaheim Gardens, *et al.* (specifically, the Second-Wave Plaintiffs (SWPs)), and defendant, the United States, respectfully provide the following joint status report regarding the parties' discovery efforts since the filing of their October 16, 2024 joint status report.

1. On November 6, 2024, SWPs served their third set of interrogatories.
2. The United States is reviewing SWPs' third set of interrogatories and drafting responses to them.
3. The parties have been discussing potential dates for the parties to take depositions.
4. Since the parties' filing of the October 16, 2024 status report, counsel for the United States have been engaged in a review of the documents produced by SWPs and by the United States. Counsel for the SWPs are also reviewing documents previously produced by the SWPs and by the United States.
5. The parties are separately working on a joint status report proposing a trial schedule for the first group of SWPs, as ordered by the Court, ECF No. 793, and are intending to submit that joint status report on November 26, as ordered.

Respectfully submitted,

s/ Harry J. Kelly
Harry J. Kelly
NIXON PEABODY LLP
799 9th Street N.W., Suite 500
Washington, D.C. 20001
(202) 585-8000
hkelly@nixonpeabody.com

Attorneys for Plaintiffs

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

PATRICIA M. McCARTHY
Director

s/ Franklin E. White, Jr.
FRANKLIN E. WHITE, JR.
Assistant Director

s/ Amanda L. Tantum
AMANDA L. TANTUM
EMMA E. BOND
Senior Trial Counsel
A. BONDURANT ELEY
Senior Litigation Counsel
TATE N. WALKER
BRITTNEY M. WELCH
JOSHUA W. MOORE
Trial Attorneys
Commercial Litigation Branch
Civil Division, Department of Justice
P.O. Box 480, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-8131
E-mail: amanda.tantum@usdoj.gov

Attorneys for Defendant

November 15, 2024